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Attorneys for Keurig Green Mountain, Inc.

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

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|--|------------------------|
| In re: | Chapter 11 |
| BED BATH & BEYOND INC., <i>et al.</i> , ¹ | Case No 23-13359 (VFP) |
| Debtors. | Jointly Administered |

APPLICATION FOR ADMISSION *PRO HAC VICE*

The Application of Catherine E. Youngman respectfully represents as follows:

1. I am a partner with Fox Rothschild LLP, which law firm maintains an office at 49 Market Street, Morristown, New Jersey 07960-5122, among other locations, and the undersigned hereby submits this Application seeking an Order granting the admission *pro hac vice* of Richard W. Ward, Esq. in connection with the Bed Bath & Beyond Inc. chapter 11 Bankruptcy. (the “Bankruptcy Case”).
2. I am an attorney-at-law of the State of New Jersey and am admitted to practice before the United States District Court for the District of New Jersey.

¹ The last four digits of Debtor Bed Bath & Beyond Inc.’s tax identification number are 0488. A complete list of the Debtors in these chapter 11 cases and each such Debtor’s tax identification number may be obtained on the website of the Debtors’ claims and noticing agent at <https://restructuring.ra.kroll.com/bbby>. The location of Debtor Bed Bath & Beyond Inc.’s principal place of business and the Debtors’ service address in these chapter 11 cases is 650 Liberty Avenue, Union, New Jersey 07083.

3. I submit this Application, pursuant to Civ. Rule 101.1(c) of the Local Rules of the United States District Court for the District of New Jersey and Rule 9010-1 of the Local Rules of Bankruptcy Practice for the United States Bankruptcy Court for the District of New Jersey, in support of an Order approving admission, *pro hac vice*, of Richard W. Ward, Esq.

4. Richard W. Ward is an attorney who maintains a law office located at 6304 Teal Ct., Plano, TX 75024.

5. Upon information and belief, Richard W. Ward is a member in good standing of the following state and federal bars: State of Texas, admission 1982; State of Louisiana, admission 1982; United States Northern District of Texas, admission 1981; United States Western District of Louisiana, admission 1981; United States Court of Appeals for the Fifth Circuit.

6. Upon information and belief, Richard W. Ward is not under suspension or disbarment by any court. Additionally, there are no disciplinary proceedings pending against him in any jurisdiction, and no discipline has previously been imposed on him in any jurisdiction.

7. Richard W. Ward does not maintain an office in the State of New Jersey.

8. The statements in paragraphs 4 through 7 of this Application are made in reliance upon the Certification of Richard W. Ward submitted herewith.

9. No previous application has been made for the relief sought herein.

10. Notice of this Application has been given to: (a) the Office of the United States Trustee; (b) counsel for the Debtors in this Bankruptcy Case; and (c) all parties who have requested notice in this Bankruptcy Case.

WHEREFORE, Applicant respectfully requests an entry of Order submitted herewith approving the admission *pro hac vice* of Richard W. Ward, Esq. to appear and participate in the above-captioned matter before this Court.

Respectfully submitted,

By: /s/ Catherine E. Youngman
CATHERINE E. YOUNGMAN
Fox Rothschild LLP

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**Certification of Richard W. Ward in Support of Application
for Admission of Counsel *Pro Hac Vice***

Pursuant to LBR 9010-1 and 7007-1, I, **Richard W. Ward**, hereby certify as follows in support of the application for admission *pro hac vice* that has been filed on my behalf:

1. I am an attorney with my office located at 6304 Teal Ct., Plano, TX 75024. My telephone number is (214) 769-8639, my facsimile number is (212) 969-2900 and my email address is rward@airmail.net.
2. I am eligible for admission to this Court, am admitted to practice in and am a member in good standing of the following state and federal bars: State of Texas, admission 1982; State of Louisiana, admission 1982; United States Northern District of Texas, 1981; United States Western District of Louisiana, 1981; United States Court of Appeals for the Fifth Circuit.

¹ The last four digits of Debtor Bed Bath & Beyond Inc.'s tax identification number are 0488. A complete list of the Debtors in these chapter 11 cases and each such Debtor's tax identification number may be obtained on the website of the Debtors' claims and noticing agent at <https://restructuring.ra.kroll.com/bbby>. The location of Debtor Bed Bath & Beyond Inc.'s principal place of business and the Debtors' service address in these chapter 11 cases is 650 Liberty Avenue, Union, New Jersey 07083.

3. There are no disciplinary proceedings pending against me and no discipline has ever been imposed against me.

4. I agree to be bound by the Local Rules of the United States District Court for the District of New Jersey and the Local Rules of Bankruptcy Procedure for the District of New Jersey and that I will submit to the disciplinary jurisdiction of this Court for any alleged misconduct during the course of this case.

5. I will arrange with the New Jersey Lawyers' Fund for Client Protection for payment of the annual fee, for this year and for any year in which I continue to represent a client in a matter pending in this Court in accordance with New Jersey Court Rule 1:28-2 and D.N.J. L. Civ. R. 101.1, as well as arranging for the \$150.00 fee required by D.N.J. L. Civ. R. 101(c)(3) for pro hac vice admission to the District Court for the District of New Jersey within twenty (20) days of the date of the entry of an Order granting my Application.

I declare under penalty that the foregoing is true and correct.

/s/ Richard W. Ward
Richard W. Ward

Dated: September 7, 2023

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

In Re:

Case No.: _____

Adv. No.: _____

Chapter: _____

Judge: _____

ORDER FOR ADMISSION PRO HAC VICE

The relief set forth on the following page is **ORDERED**.

This matter having been brought before the Court on application for an Order For Admission Pro Hac Vice; and the Court having reviewed the moving papers of the applicant, out-of-state attorney, and considered this matter pursuant to Fed.R.Civ.Proc.78, D.N.J. L.Civ.R.101.1 and D.N.J. LBR 9010-1, and good cause having been shown; it is

ORDERED that _____ be permitted to appear pro hac vice; provided that pursuant to D.N.J. L.Civ. R. 101.1(c)(4), an appearance as counsel of record shall be filed promptly by a member of the bar of this Court upon whom all notices, orders and pleadings may be served, and who shall promptly notify the out-of-state attorney of their receipt. Only an attorney at law of this Court may file papers, enter appearances for parties, sign stipulations, or sign and receive payments on judgments, decrees or orders, and it is further

ORDERED that the applicant shall arrange with the New Jersey Lawyers' Fund for Client Protection for payment of the annual fee, for this year and for any year in which the out-of-state attorney continues to represent a client in a matter pending in this Court in accordance with New Jersey Court Rule 1:28-2 and D.N.J. L. Civ. R. 101.1, said fee to be deposited within twenty (20) days of the date of the entry of this Order, and it is further

ORDERED that the \$150.00 fee required by D.N.J. L. Civ. R. 101(c)(3) for pro hac vice admission to the District Court for the District of New Jersey shall also be payable within twenty (20) days of entry of this Order. Payment in the form of a check must be payable to "Clerk, USDC" and forwarded to the Clerk of the United States District Court for the District of New Jersey at the following address:

United States District Court
District of New Jersey
Martin Luther King, Jr. Federal Building
50 Walnut Street
Newark, N.J. 07102
Attention: Pro Hac Vice Admissions

and it is further ORDERED that the applicant shall be bound by the Local Rules of the United States District Court for the District of New Jersey and the Local Rules of Bankruptcy Procedure for the District of New Jersey; and it is further

ORDERED that the Clerk shall forward a copy of this Order to the Treasurer of New Jersey Lawyers' Fund for Client Protection within 5 days of its date of entry.